1   the capacity question as to whether the underlying

2   OSS is capable of handling the traffic that is to be

3. expected because of being in the wholesale business.

4   We examined that--our calculation of that

5   indicated at present in terms of the four areas of

6   information we have at the moment, that should not be

7   an issue. I believe that the biggest impact would be

8   on the service order system potentially, and if we

9   look at the extremes of statements that have been

10 made with regard to forecast--I'm not talking about

11 forecast, I'm talking about statements that have been

12 made even publicly about forecast and the potential

13 business, we would be looking at something like the

14 order of 20 to 25 percent additional load on the

15 service order system, for example, if those

16 conditions apply.

17   Those systems in fact already experience

18 fluctuations in the order of 50 percent, for example,

19 at college sign-up time in the fall where we do

20 experience significant peaks of activities, so the

21 first element of the background OSS is we feel our

22 capacity issues are well taken care of.

23   In terms of the gateway, which is the DCAS

24 system, which is put in place to handle the incoming

1   traffic that is coming from the resellers and CLECs,

2   the issue there is the system itself is a very

3   scalable system, it essentially I based on several

4   servers and network and we apply to that technique

5   similar technique we do in planning a network in

6   determining what kind of traffic it is capable of

7   supporting. What we have in place right now has

8   enough resource in place to handle a traffic we have

9   today.

10   The plans we have in place to expand that

11 capability through certainly the April, June, and

12 September timeframe will provide significant

13 capability of handling that kind of traffic and, if

14 we experience traffic loads that are in excess of

15 what we think are going to happen, the means of

16 adding on capability is fairly straightforward.

17   Q   I believe you mentioned in your estimate,

18 NYNEX could handle 25 percent of additional load.

19 What does that translate into actual number? What is

20 the current load you handling?

21   A   (Miller) I think Mr. Butler mentioned this

22 morning the service order system. We basically

23 complete about a million orders a month. We handle

24 significantly more than that, other orders that are

1   not completed, so you can calculate that yourself, I

2   guess.

3   MR. DINGWALL: Thank you.

4   JUDGE STEIN: Yes?

5   BY MR. REUBEN:

6   Q   Mr. Miller, what do you mean a service

7   order? What does that encompass? Is the order for a

8   new customer whether it is flipping or is it any kind

9   of order, for example, to add a feature?

10   A   (Miller) In fact, the service order system

11   is capable, and in 1996, for example, handled a total

12   of 764 million transactions. There are multiple

13   transactions that are associated with a single

14   service order and basically begins--we say the

15   capacity as well can handle for that.

16   Q   When you describe a service order, does

17   that mean something as simple as calling up a

18   customer service record or is this placing an order

19   for a customer?

20   A   (Miller) The million service orders a month

21   that Mr. Butler referred to referred to the

22   provisioning of a line, I believe, as opposed to the

23   addition of a feature. Would that be correct?

24   A   (Butler) Actually no; it includes both. It

1   would not be preorder functions. The placement of a

2   service order is just, is exactly that, a request for

3   service. It could be augmenting your existing

4   service; it could be adding a brand new service.

5   Q   Does it include requests for repair?

6   A   (Butler) No.

7   Q   What is the average response time for a

8   NYNEX resale, retail representative when placing a

9   request for a customer service record for the

10 preordering system?

11   A   (Miller) The average response time depends

12 on a lot of factors, on the size of the CSR itself?

13 Each entry that a retail service rep makes to the

14 system will bring back a response of a single page of

15 a CSR.

16   A typical—a low CSR will have three or

17 four pages. In the business context. There are very

18 often 50 and well more than 50 pages of CSRs and each

19 one will require a response. A specific transaction

20 response we expect to see in terms of entering the

21 data and entering and hitting the enter button and

22 getting a response can be anywhere between 2 and 10

23 seconds for that entire process in place.

24   Q   How long does it take to find out about

1 feature availability at a particular location?

2   A   (Miller) I don't have that information

3 exactly. I can surmise that it is about the same

4 order of magnitude.

5   Q   And when a NYNEX or New York Tel retail

6 representative is finished with a customer service

7 order and hits an enter button, how soon does that go

8 into the NYNEX ordering system?

9   A   (Miller) That will enter the ordering

10 system in the same kind of timeframe that I just

11 mentioned in terms of a CSR. It will then undergo a

12 series of checks that are automated by the system and

13 at that point the rep does not get a confirmation

14 back that the order has been accepted.

15   Q   So at that point you say it goes through as

16 many minutes to CLECs to make sure the order is

17 satisfactory?

18   A   (Miller) Yes.

19   Q   And then it goes into these systems

20 automatically and instantaneously; is that correct?

21   A   (Miller) That's correct.

22   Q   Do NYNEX retail representatives have the

23 opportunity to identify a customer's bill telephone

24 number by gong to a working telephone number?

1   A   (Miller) In many cases they do. They are

2   able to do that. Of course, the relationship between

3   billing telephone number and working telephone number

4   can be one to many, and in—one of the reasons that

5   we hadn't provided at this point in time that ability

6   for a reseller to derive the same number was because

7   of a concern about privacy. We've addressed that and

8   we have a change in place that will provide that

9   capability in the near future. I believe it is we

10   have it in, subject to correction, I believe it is

11   two months.

12   Q   Will that give the resale representative

13   exactly the same information as a NYNEX retail

14   representative and all the same capabilities to

15   access a bill telephone number from a working

16   telephone number?

17   A   (Miller) I'm not aware of any differences

18   between those two.

19   Q   NYNEX has the ability to modify

20   specifications for its EIF interface, does it not?

21   A   (Miller) Yes. It does.

22   Q   Has it not changed the EIF interface a

23   number of times in the last six or eight months?

24   A   (Miller) When NYNEX defined the EIF

1   interface it was being defined in the absence of any

2   national standard. We were being required to provide

3   interfaces in a very accelerated timeframe and we

4   thought we had to put in place interface definitions

5   that would suit the kind of business that we're going

6   to, first of all, through the reseller business and

7   ultimately through the unbundled element business and

8   therefore, indeed, the EIF specification has

9   undergone additions and changes as we have learned

10 more about the kind of business that are forthcoming

11 and as in fact we had to deal with things like the

12 FCC order on August 8th.

13   Q   Haven't you in fact been informed that the

14 customer who is being the EIF interface has had his

15 service interrupted when changes were made to the EIF

16 interface and, in fact, some of those changes were

17 not disclosed at the time? They were not?

18   A   (Miller) I personally am not aware of that.

19   Q   Anyone on the panel know that? Mr. Kennedy

20 has spoken of it in his statement I wonder if he

21 could elucidate on that?

22   A   (Kennedy) There were two instances, the

23 first being the first of January, the second being

24 the first of March where revisions were made to the

1   EIF specifications. We were not advised in advance.

2   And on the first business day following those

3   updates, orders that we sent in to DCAS were rejected

4   because they didn't meet the system edits.

5   ·   In both cases we were advised by the folks

6   at the systems administration group down at the

7   resale center that we would get a new copy of the

8   specifications and in both cases they were delivered

9   by messenger to us that day and we were able to bring

10 our system back up.

11   Unfortunately, we were told the second time

12 which was March 1st that we were on the distribution

13 list and we would get advised in advance if there are

14 any additional changes to be made.

15   April 1st there were additional changes

16 that were made. We were not notified and just

17 yesterday, again, orders were rejected by the system.

18   MR. REUBEN: I have—

19   JUDGE STEIN: Mr. Reuben, you're out of

20   time.

21   MR. REUBEN: Sorry.

22   JUDGE STEIN: Thank you. We had two other

23   hands for questions. No? Okay. It's 4

24   o'clock. Let's give the reporter a break.

1   We'll reconvene in 15 minutes.

2   (Recess taken at 4:00 p.m. and reconvened

3   at 4:32 p.m.)

4   JUDGE STEIN: I think we would like to go

5   back on the record and to go just to go 6

6   o'clock tonight and then end for tonight. We're

7   optimistic that we can get through the bulk of

8   what we have in that time period. Maybe Andy

9   can lay out what he'd like to do and we should

10   probably take a minute after we break. We'll

11   have a little off-the-record conference on what

12   bits and pieces we have left over from yesterday

13   and whether we want to go to them tomorrow or

14   Friday but we don't—you don't need to be on the

15   record.

16   (Discussion had off the record.)

17   We're going to start with further comments

18   by the NYNEX panel?

19   A   (Miller) Okay. Thank you, Your Honor.

20   Clearly there are many comments, observations and

21   questions and so on about the OSS interface

22   particularly and NYNEX needs time to respond

23   particularly to those items which are specifically

24   mentioned but we need to go back and do some

1   research. We have successes for 3500 CSR processes;

2   we have processed 2,900 validation, 11oo conduit and

3   4600 product availability requests, so the systems

4   are in operation; some people are using them.

5   We have, in addition, trained 180

6   representatives from 48 CLECs who are operating or

7   plan to operate as resellers and, in addition, 6

8   CLECs who plan to operate in the unbundled element

9   network interconnect and we have another 3 companies

10   currently scheduled for training in that area in the

11   interface system we're offering.

12   One thing that I would like to address

13   specifically is the comments that are made about the

14   response times in terms of the web GUI system

15   particularly because there obviously is a great deal

16   of concern associated with that, and I'd like to

17   point out, again, that the strategy that NYNEX

18   adopted when we were entering this business was to

19   put in place a system that we felt would be easy for

20   people to get into the market and that was the

21   essence behind the design of the web GUI system.

22   Indeed, in much of the design we have put

23   in place capabilities, screen designs and so on that

24   are not available to our retail representatives, and,

1 in fact, we believe our in advance in knowledge and

2 understanding of how this business is conducted.

3   Now the trade-off of that is very clearly

4 that kind of an interface is not the most speedy in

5 the business. There's no question about that. I

6 think most people here who have experience using

7 Internet will have experienced similar kind of leaks

8 to response times.

9   We nevertheless understand that even with

10 that the response times that are being provided right

11 now can be improved and, in fact we have put in place

12 mechanisms to improve these response times in such a

13 way that we will definitely improve significantly the

14 performance and the response time of that particular

15 system but, nevertheless, I need to reiterate that we

16 do not expect to be the main interface that is used

17 even for preorder transactions.

18   We fully expected in getting in this

19 business particularly the larger carriers will be, in

20 fact, implementing systems of their own because they

21 will have their own procedures and practices in place

22 in order, in terms of conducting a negotiation with

23 their customers. We feel sure that some of them will

24 be conducting direct mail campaigns, will get

1 responses to their written mail campaigns and they

2 will be wanting to issue orders to NYNEX in a bulk

3 form which is not a interactive form, which is again

4 why we put in place bulk order capabilities.

5   So, for example, in the case of the EIF

6 interface, which will provide an ability for a CLEC

7 to have its own system to communicate with our

8 system, we understand the response time there is not

9 as we would like to it to be at present, particularly

10 Mr. Kennedy and his company using this and that's the

11 one singular experience we have in production.

12   We are examining that and we believe we

13 have, we're going to conduct some tests to improve

14 that but it should be pointed out as an example that

15 a single request going through EIF with one single

16 request could contain up to 99 CSR requests within

17 that single request and get 99 responses within

18 whatever response time we're able to provide. And

19 the same with other preorder transactions. And,

20 again, how those responses are interpreted by the

21 CLEC system is something which is determined by the

22 CLEC.

23   We, in terms of the standards, I'd like to

24 dress now the adoption of EDI and other national

1   standards which were comments that were made.

2   As was pointed out today there is no

3   standard, national standard for preordering

4   transactions. Indeed a recommendation was made on

5   March 7th. That recommendation is that to be

6   ratified which we fully expect would be and NYNEX

7   fully expects to fully implement that standard when

8   it is ratified. Obviously, we're looking at it right

9   now.

10   So other strategy is to pursue these

11   standards, to implement them as necessary, because we

12   made the decision to put in place earlier interfaces

13   that would not be adopted to standard. We have, in

14   fact, pledged to those customers that we could

15   continue with those interfaces so they would not be

16   required if they chose not to re-implement systems to

17   conform to the new standards.

18   In addition to that, we have been, we

19   continue to negotiate in good faith with at least two

20   of the major carriers in terms of developing a

21   commitment to the implementation of EDI, even

22   overlapping the definition of standards, so we're

23   negotiating to provide that EDI capability and we are

24   also as part of the negotiations agreeing to commit

1   to the standard when that comes in place. That is

2   particularly true of AT&T.

3   Now I'd like to address the flow through

4   issue that was brought up. When we designed these

5   systems, we believed that the yardstick that was most

6   of importance to a CLEC was the yardstick of the

7   provisions interval, can the customer get their

8   service in a timeframe that our customer can get

9   equivalent service.

10   In fact, that is the yardstick that we're

11   using in terms of flow through. We will put, we have

12   committed to put in place if we are not able to flow

13   through order transactions through the mechanized

14   systems, then we will put in place people who will

15   provide service intervals in the same--to the same

16   degree that our own reps provide, and as we go on--

17   this is a very complex system. I'm sure I don't need

18   to tell you. We have up to 40 systems in the OSS

19   world that have to interact with each other and

20   through which we have to flow through these things.

21   We have put these eight transactions order types in

22   place, which were put in this week in fact and we

23   intend to continue that.

24   Clearly, what we are trying to effect here

1 is our own efficiency in handling that, so we don't

2 have to put a lot of people in place where systems

3 can, in fact, do the provisioning.

4   We need to understand by experience what

5 the mix and profile of the orders are that are coming

6 through the system. Clearly, we expect this to

7 change quite dramatically in this first few months,

8 first couple of years of being in the competitive

9 wholesale business because it depends not only on the

10 nature of the reseller but the kind of markets they

11 are going to attack and how they're going to attack

12 them, so we have to make decisions based on our best

13 estimates and in conversations with the CLECs with

14 the kinds of orders that will flowed through—that

15 will flow through.

16   I was concerned about the MCI comments in

17 terms of the trial, experiences it had with the trial

18 they have been conducting with our systems. We had

19 conducted some tests ourselves, particularly with

20 reference to the LCI experiences. We examined 84

21 orders—this is in response to MCI comment earlier—

22 54 of which were completed, 54 of which were

23 completed in the committed timeframes, 20 of them

24 were in query status which meant we had to go back to

1   MCI to request a clarification of the, or on

2   something that might have been not clear to us.

3   There were another eight of the 84

4   confirmed awaiting completion and there are two that

5   we're still, we haven't yet processed through the

6   system.

7   Service order completion dates, eight of

8   them were completed many zero days; 32 were completed

9   in one day; 7 were completed in 2 days; 5 were

10   completed in 3 days; and 2 were completed in more

11   than 3 days. I don't know how many more days than

12   three days.

13   In addition, we also recently conducted a

14   random sample of 53 reseller requests on March 19th.

15   Of those 53 requests, 46 were provisioned within 2

16   business days which representing 87 percent. 96

17   percent of the orders completed through this service

18   order processor within 3 days; 38 percent of the

19   reseller contained interconnect due dates. We had to

20   go back and clarify that.

21   In some cases the reseller might think that

22   was a completion which was in excess if the due date;

23   in fact, if the due date was incorrect, it would not

24   be that.

1   We also conducted a test yesterday, April

2 1st--whatever April 1st was, I'm sorry.

3   JUDGE STEIN: Yesterday.

4   A   (Miller) --on 40 randomly selected orders,

5 and of those we found that 39 out of 40 were

6 provisioned within the timeframe that they should

7 have been provisioned yesterday or today. That was

8 the very recent test.

9   But nevertheless, we continue to be

10 concerned about this. We need to understand when

11 these occurrences happen and certainly we want to

12 correct them because this earlier experience is

13 incredibly invaluable to us as we develop the system.

14   The problem that was mentioned in terms of

15 repairs not being able to enter into the system, this

16 is a problem we currently have with the system, and

17 it has existed for sometime as the witness mentioned.

18 This problem is due to be fixed before the end of

19 April, and it affects the fact that the identity of

20 the reseller is not appearing on the record when the

21 record is going through the system and that probably

22 will be fixed by the end of April.

23   I'd like, also, to address, again, I'm

24 trying to do this in general terms so that we can

1   progress along here, but three of the witnesses have

2   brought up the issue of migration as specified or

3   convert as specified, and in fact we are negotiating

4   with all of those companies instead of trying to

5   bring about a resolution of this issue.

6   We had not implemented that function

7   initially. The issue was discussed during the

8   collaborative sessions that the Commission undertook

9   last year and at that time it was not a requirement

10   to implement that.

11   There are some significant business issues

12   associated with it, not the least of which is our own

13   retail reps do not have the ability to do this. They

14   would have to, in fact, conduct the same comparison

15   of the CSR as a retail function. We do not believe

16   it is really a wholesale function but that's not my

17   intention to conduct negotiation here, I apologize,

18   but the point is that we're trying to reach some

19   conclusion of this, of this particular issue in

20   negotiations with the carriers.

21   In terms of capacity, again, I'd like to

22   add that in terms of the capacity of the gateway

23   system which I think is a concern that a lot of

24   people have over this issue, we have at present in

1   the DCAS systems which handles not only the web GUI

2   but also the EIF transactions and the EDI

3   transactions, so therefore that is a potential

4   capacity point that we need to address.

5   We basically have two servers in place

6   today handling all the traffic that is coming in

7   through the systems. Those two servers will go to

8   the 11 by the end of April and we currently have in

9   place if the businesses demand it they will be able

10   to go to 27 by the end of August. Again, that is an

11   indication of the order of magnitude of what we have

12   to put in place to handle the capacity issue.

13   BY JUDGE STEIN:

14   Q   Can you slow down? I'm speeding you up and

15   slowing you down simultaneously which doesn't seem

16   particularly fair.

17   A   There was a comment made about not being

18   able to have access to the help desk that we put in

19   place, that we have put in place to offer help to the

20   resellers representatives who are having trouble

21   using our system. In fact, we did have a problem I

22   believe. We had a I hunt group problem at one time

23   which we couldn't resolve. We have since then put a

24   voice mail capability which hunts. We have no

1   respond to any voice mail within 15 minutes at

2   present. We have to put in mail mechanisms to

3   improve that capability.

4   Now, I had not planned to go into any of

5   the other specifics that were brought up in the

6   testimony that was provided. As I say, I'd like the

7   time to go back and, if we have to enter on the

8   record the responses to those specifically—

9   JUDGE STEIN: That's fine. You want to

10   move to the next area?

11   MR. KLEIN: Why don't we do that.

12   Q   I'd like to ask the competitors who have

13   had any experience with the operations support

14   systems regarding the ordering of unbundled network

15   elements to give us some feedback similar to what the

16   competitors gave us in the resale arena and I guess

17   this time we'll go from this side of the table

18   starting with TCG if you have a comment and then

19   we'll proceed down the line.

20   JUDGE STEIN: Again, let me just admonish

21   you we have the affidavits. We will study them;

22   we have studied them and also I put the fans on

23   so it is kind of noisy. If you can use the

24   microphone, it will make it easier for everyone.

1   A   (DeJoy) I won't reiterate some of the

2   problems that already have been stated by the others

3   than saying that we've encountered similar issues

4   like downtime problems, logging on as well as

5   help-desk expertise.

6   Comments on unbundled loops, which from our

7   perspective is purely purchasing copper to provide

8   our dial tone to our customers. We've been working

9   with NYNEX for close to four months now trying to get

10 what's been referred to as the GUI interface

11 operational.

12   We have even delayed a beta trial to ensure

13 that our network infrastructure will work with

14 theirs, et cetera, in a hope to get this system

15 operational. We then decided to proceed by ordering

16 unbundled loops via faxed forms which have changed on

17 more than one occasion without us being notified,

18 which did cause a couple of order queries.

19   We did attend their training class but, as

20 I said, our biggest issue is still getting the system

21 operational. It's a daily battle that our ISP people

22 are having with theirs.

23   Some brief results of our trial: We tested

24 30 beta customers and the average interval which

1   seemed to be a topic of discussion here ranged

2   anywhere from 10 to 16 days to turn up an unbundled

3   loop.

4   I would like to comment on some other OSS

5   systems that we used for our core business with

6   NYNEX. We used what we call DCAS carrier, which is a

7   dial up standalone PC application which allows TCG to

8   do some query, to conduct some queries on NYNEX for

9   interface information prior to our issuing an order.

10   There are, I would say, one-half of the

11 applications within what I'm calling DCAS carriers,

12 are not functional, and they are service address

13 validation, service order status, view confirmation

14 notice. What is working for us is the module within

15 DCAS carrier that allows us to search and verify our

16 CFAs prior to sending it over.

17   JUDGE STEIN: What is CFA?

18   THE WITNESS: (DeJoy) Circuit facility

19   assignment, nomenclature used in our cable

20   interface at our physical collocations.

21 A   What I will say is not having things like

22 this service address validation module activated or

23 working within DCAS carrier has caused an enormous

24 amount of order queries as defined before which

1   delays are provisioning cycle to our customers

2   dramatically.

3   Another issue with order queries is in a

4   lot of cases they require a lot of manual

5   intervention to resolve. Let's make a phone call to

6   their center and vice verse and--

7   JUDGE STEIN: Off the record for a second.

8   (Discussion had off the record.)

9   Back on the record.

10   We'll go back to Mr. DeJoy.

11   A   (DeJoy) I was talking about order queries,

12 and it's my belief that due to the fact that some of

13 the options are not operational for us in DCAS

14 carrier, as I was saying, service address validation,

15 and service order status causes a lot of manual

16 intervention on both our part from TCG as well as

17 that of NYNEX to resolve queries which take a lot of

18 time as well as to obtain order status to see where

19 our orders are and see when service will be turned

20 up, et cetera.

21   As it relates to, just in closing, on

22 unbundled loops, I had a couple of comments on our

23 core business and I'll be brief. We are not using

24 DCAS module not because we don't want to but because

1   we have not seen it work as of yet. We very much

2   would like to get that working so that we can

3   increase our order volumes and roll out our product

4   in the New York area.

5   As it relates to where the majority of our

6   order activity is with NYNEX, we are and have been

7   using a standalone PC application called BDS Telis,

8   which is a dial up standalone PC application which is

9   the only means that we as of right now feel semi

10   comfortable we've been using to issue our orders.

11   We have had requested that NYNEX and their

12   vendor come to our provisioning site in Denver to

13   ensure that we were set up properly and that things

14   were working. They recommended at the end of that

15   meeting that we use these on a standalone PC, don't

16   interface these PCs with our network to ensure that

17   there's nothing to corrupt the software that we're

18   using in issuing our orders.

19   So our service reps that we have that order

20   with NYNEX have two, in some cases three PCs on their

21   desk and those other PCs are used, one is used for

22   DCAS; another one is used or BDS Telis and the third

23   one for our provisioning system. We're in the same

24   boat as these other folks on the panel here in that

1   we need to enter all our orders twice. The order

2   comes in from our customer, goes into our system and

3   then we manually enter it in the other system and

4   that would apply for DCAS as well that were

5   operational.

6   But, as I said, we only semi trust BDS

7   Telis, so we've had NYNEX agree to do was to review a

8   daily fax of all the orders that we send over daily

9   to ensure that they received them and they send us

10 another fax on the following day to tell us which

11 ones,they did or did not receive. It's a very manual

12 process for us.

13   Back in September of last year, which was

14 when we agreed to start doing this process, we also

15 agreed that it's time to roll out what's called NDM

16 which is a network data mover which was mentioned

17 before by Mr. Miller.

18   We have been trying to get this to work

19 since October and it's been a very painful effort

20 from our MIS folks working with theirs in Blue Hill

21 to get this system functioning, and it is my belief

22 that, if NDM were operational, we would not have the

23 dual manual order entry that we and most of these

24 other folks are faced with today.